



March 4, 2025

The Honorable Alvin K. Hellerstein
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10017

RE: *United States v. Charlie Javice and Olivier Amar, 23 Cr. 251 (AKH)*

Dear Judge Hellerstein:

This letter seeks clarification regarding the Court's order on the record today related to disclosure of attorney notes. To be clear, Ms. Javice is eager to comply with the Court's order.

Ms. Javice has already disclosed two of the three documents submitted to the Court, albeit with redactions as articulated in our privilege log. These were a memorandum marked CJ-JZ-01 and an email marked CJ-JZ-02. Ms. Javice seeks clarification on whether she is required to disclose unredacted copies of these documents. Of particular importance is CJ-JZ-02, which contains attorney notes regarding a witness that Ms. Javice does not intend to call at trial. It is Ms. Javice's position that these documents as redacted by Ms. Javice (marked CJ-JZ-01-R and CJ-JZ-02-R) meet her disclosure requirement. Ms. Javice asks this Court if such disclosure complied with the Court's order.

With respect to the handwritten attorney notes in document CJ-CHC-01, Ms. Javice interprets the Court's order to require a disclosure of these notes. However, there are certain portions that Ms. Javice believes should be redacted because they are not statements of the witness and requests leave from the Court to disclose the redacted version to the government and submit it to the Court for in-camera review.

The requirements of disclosure should not be more onerous for the defendants than for the government. So, if the Court does not permit redactions in these defense attorney notes consistent with our privilege log with respect to CJ-JZ-01 and CJ-JZ-02 and to be claimed with respect to CJ-CHC-01, or the government objects to said redactions, Ms. Javice moves the Court to require the government to provide to the defense fully unredacted versions of all 26.2 and 3500 materials in its possession. The government has redacted its similar materials in many instances without providing a privilege log or submitting unredacted versions of these materials to the Court for in-

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camera review, as the Court has required of the defendants.

Respectfully submitted,



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